

Question 9:

Bondtel, Inc. ("Bondtel") desires streamlined processing pursuant to Section 63.12 of the Commission's rules. Bondtel qualifies for streamlined processing under Section 63.12(c)(1)(ii) because although Bondtel is affiliated with a foreign carrier in a destination market, Bondtel qualifies for a presumption of non-dominance under Section 63.10(a)(3). As more fully described in response to Question 11 below, Bondtel qualifies for a presumption of non-dominance under Section 63.10(a)(3) because the foreign carrier with which Bondtel is affiliated is not a monopoly provider and does not have more than 50% of the market share for international transport or local access on the foreign end of the relevant routes.

The other restrictions set forth in Section 63.12(c) of the Commission's rules do not apply. Bondtel does not have an affiliation with a dominant U.S. carrier whose international switched or private line services the applicant seeks authority to resell. And Bondtel does not seek authority to provide switched basic services over private lines to a country for which the Commission has not previously authorized the provision of switched services over private lines.

Question 11:

**63.18(i)** – Bondtel hereby certifies that it is affiliated with National Telecommunications Cards Company ("NTCC"), a corporation formed under the laws of Egypt that holds a telecommunications license from the National Telecommunications Regulatory Authority of Egypt. NTCC owns 60% of Bondtel.

**63.18(j)** – Bondtel hereby certifies that it seeks to provide international telecommunications services to Egypt, where its foreign carrier affiliate NTCC provides services.

**63.18(k)** – Egypt is a member of the WTO. In addition, NTCC lacks market power in Egypt. Telecom Egypt is the dominant, government-owned provider for Egypt. Although the market was liberalized in 2002, Telecom Egypt still provides more than 50% of all telecommunications services in Egypt. With respect to the calling card market served by NTCC, Bondtel estimates that there are approximately 1,450 million minutes of calling card traffic per year in Egypt. NTCC provides about 332 million minutes per year in calling card traffic in Egypt, which equates to about 22.8% of the calling card market in Egypt. NTCC does not provide local access services.

**63.18(l)** – Bondtel desires the authority to resell the international switched services of an unaffiliated U.S. carrier on the routes to Egypt. Accordingly, pursuant to Section 63.10(a)(3), Bondtel hereby certifies that NTCC is not a monopoly provider in Egypt. Bondtel further submits the following information to demonstrate that NTCC does not have sufficient market power on the foreign end of the route to Egypt to adversely affect competition in the U.S. market: Telecom Egypt is the dominant provider for Egypt. NTCC does not provide local access. Although the market was liberalized in 2002, Telecom Egypt still provides more than 50% of all telecommunications services in Egypt. With respect to the calling card market served by NTCC, Bondtel estimates that there are approximately 1,450 million minutes of calling card traffic per year in Egypt. NTCC provides about 332 million minutes per year in calling card traffic in Egypt, which equates to about 22.8% of the calling card market in Egypt.

**63.18(m)** – Bondtel desires to be classified as non-dominant. Bondtel submits that the information set forth above for Section 63.18(l) demonstrates that it is presumptively non-dominant under Section 63.10(a)(3) of the Commission’s Rules.

Question 12:

As described above, Bondtel desires to be authorized to provide international telecommunications services to, among other countries, Egypt, where it has a foreign carrier affiliation as described above.

Question 15:

- (d) Bondtel has not received authority previously under Section 214 of the Communications Act.
- (e) Bondtel certifies that it will comply with the terms and conditions contained in sections 63.21, 63.22 and 63.23 of the Commission's rules.
- (f) At this time, Bondtel seeks no other authorization available under Section 63.18(e).
- (g) Not applicable.